

### **REMARKS/ARGUMENTS**

This Amendment is in response to the Office Action mailed 10/23/2006. Claims 1-14 were pending in this application. Claims 1-14 are rejected by the Examiner. Claims 4-5 have been canceled. This response amends claims 1-3. Claims 1-3 and 6-14 are currently pending. Reconsideration of the rejected claims is respectfully requested.

#### **35 U.S.C. §102 Rejection, *Mikhailov***

Claims 1-14 are rejected under 35 U.S.C. 102(e) as being anticipated by *Mikhailov* et al (U.S. Patent No. 6,968,500) (hereinafter "*Mikhailov*"). Applicants respectfully submit that *Mikhailov* does not disclose each element of these claims. For example, Applicants' claim 1 as amended recites a metadata validation system for validating an object model, the system comprising:

- a client device configured to receive user input and provide a user interface to a user;
- a database for storing objects corresponding to the object model and metadata describing the object model;
- a configuration management module for creating a deployable collection of objects using the object model; and
- a validation engine for validating the metadata in the database, wherein said validation engine is configured to perform completeness validation applying a completeness validation rule on a first validation subject in response to a user entered command to perform validation on the validation subject, to automatically perform correctness validation applying a correctness validation rule on a second validation subject when the subject is created or updated, and to automatically perform completeness and correctness validation on a validation subject when requested by the configuration management module. (*emphasis added*).

Such limitations are not disclosed by *Mikhailov*. Rather, *Mikhailov* discloses an automatic forms handling system, where the service definition may be saved as metadata in the database table associated with that form. (*Mikhailov*, col. 14, lines 63-64). If the service definitions are to be updated, the "YES" branch is followed to step 618, in which the forms engine updates the service definition. Service definitions may be updated by replacing the existing service definitions, creating new service definitions or creating a change file for the updated service definitions. (*Mikhailov*, col. 10, lines 46-52). Moreover, forms engine **validates form submissions**. (*Mikhailov*, col. 10, lines 55-56). The service definition includes

instructions for rendering a compiled report, form logic to be implemented by the forms engine when receiving forms submissions, and instructions for handling form submissions. For example, form logic may include required fields for a **valid submission** and data types and ranges for individual **data entries**. (*Mikhailov*, col. 7, lines 10-25). The forms engine determines whether a report is to be updated. If a report is to be updated, the "YES" branch is followed. A report update may be implemented by replacing an existing report, creating a new report, or creating a change file for the updated report. (*Mikhailov*, col. 10, lines 29-30).

It is asserted in the office action that the metadata includes the service definition specifying form logic, instructions for processing form submissions, and instructions for generating reports. (Office Action dated 11/21/2006, p. 6). Although the service definition may be saved as metadata in the database table, *Mikhailov* fails to disclose validating the metadata, as is claimed by Applicants. There is no mention in *Mikhailov* of validating the service definitions. *Mikhailov* mentions validating form submissions, however, **form submissions are not metadata. Form submissions are instead data itself**, entered into an existing form as stored in the database.. *Mikhailov* also discloses that service definitions may be updated. However, updating service definitions, as taught by *Mikhailov*, does not comprise validating metadata, as is claimed by Applicants. Accordingly, *Mikhailov* does not disclose validating the metadata, as is claimed by Applicants.

*Mikhailov* also fails to disclose validating the metadata and applying a completeness validation rule on a validation subject and applying a correctness validation rule on a validation subject, as is claimed by Applicants. *Mikhailov* further discloses three types of service definitions. First, form logic to be implemented by the forms engine to validate the submission and data entries of the submission. (*Mikhailov*, col. 7, lines 10-25). Even if, for purposes of argument, the form logic is read as a validation rule being applied on a form submission, *Mikhailov* fails to disclose validating metadata. As previously mentioned, **form submissions are data, and are not metadata**. Second, *Mikhailov* discloses service definitions to include instructions for handling form submissions. (*Mikhailov*, col. 7, lines 10-25). Even if, for purposes of argument, the instructions for handling form submissions are read as validation

rules, **the form submissions, upon which the instructions are applied, do not comprise metadata**. Third, *Mikhailov* discloses service definitions to include instructions for generating and delivering reports. (*Mikhailov*, col. 7, lines 10-25). Even if, for purposes of argument, the report instructions are read as validation rules, and the report is read as the metadata upon which the report instruction is applied, **generating and delivering does not comprise validating**, as is claimed by Applicants. Additionally, the report does not comprise metadata in the database, as is claimed. *Mikhailov* makes no mention of storing the report in the database. Accordingly, *Mikhailov* does not disclose validating the metadata in the database, as is claimed by Applicants.

As such, *Mikhailov* cannot anticipate Applicants' claim 1, or the claims that depend therefrom. Independent claims 8 and 14 recite limitations that similarly are not disclosed by *Mikhailov*, and further disclose meta metadata objects, as discussed above, which are not disclosed by *Mikhailov*, such that *Mikhailov* cannot anticipate claims 8 and 14, or the claims that depend therefrom. Applicants therefore respectfully request that the rejection with respect to claims 1-14 be withdrawn.

### **III. Amendment to the Claims**

Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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